

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,	:	Case No.: 1:19-cr-00552-JPC
Plaintiff,	:	
	:	
v.	:	NOTICE OF MOTION
	:	
EDWARD SHIN,	:	
	:	
Defendant.	:	

TO: Honorable John P. Cronan, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Assistant U.S. Attorney Tara LaMorte
Assistant U.S. Attorney Anden Chow
United States Attorney's Office
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007

Sirs and Madam:

PLEASE TAKE NOTICE that on September 21, 2022 at 10:00 a.m.,
Defendant Edward Shin by his counsel Robert J. Basil, Esq. of The Basil Law
Group, P.C. and Paul B. Brickfield, Esq. of Brickfield & Donahue will move for a
downward departure, variances and other relief.

A Sentencing Memorandum and Declaration of Robert J. Basil, Esq. are
submitted in support of this Motion. Oral argument is respectfully requested.

Respectfully Submitted,

/s/ Robert J. Basil, Esq.

Robert J. Basil, Esq.
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/s/ Paul B. Brickfield

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Counsel for Defendant Edward Shin

Dated: September 7, 2022